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Federal Public Defender  
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Attorney for Josue Abraham Reynoso Ochoa

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSUE ABRAHAM REYNOSO OCHOA,

Defendant.

Case No. 2:22-mj-00864-NJK

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for Josue Abraham Reynoso Ochoa, that the Preliminary Hearing currently scheduled on November 16, 2022 at 4:00 p.m., be vacated and continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

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1        This Stipulation is entered into for the following reasons:

2        1.        The parties require additional time to discuss the potential for a  
3        Pre-Indictment negotiation.

4        2.        Counsel for the defendant will require additional time to review and  
5        investigate discovery and meet with the client to discuss the details prior to  
6        proceeding.

7        3.        Mr. Reynoso-Ochoa is out of custody and agrees to the continuance.

8        4.        The parties agree to the continuance.

9        5.        Additionally, denial of this request for continuance could result in a  
10        miscarriage of justice.

11        6.        The additional time requested by this Stipulation is excludable in  
12        computing the time within which the trial herein must commence pursuant to  
13        the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A),  
14        considering the factors under Title 18, United States Code, Section  
15        3161(h)(7)(B)(i), (iv).

16        This is the first request for continuance filed herein.

17        DATED: November 7, 2022.

19        RENE L. VALLADARES  
20        Federal Public Defender

21        By /s/ Joanne L. Diamond  
22        JOANNE L. DIAMOND  
23        Assistant Federal Public Defender

24        JASON M. FRIERSON  
25        United States Attorney

26        By /s/ Edward G. Veronda  
27        EDWARD G. VERONDA  
28        Assistant United States Attorney

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSUE ABRAHAM REYNOSO OCHOA,

Defendant.

Case No. 2:22-mj-00864-NJK

## ORDER

V.

JOSUE ABRAHAM REYNOSO OCHOA,

Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on November 16, 2022 at the hour of 4:00 p.m., be vacated and continued to December 20, 2022, at 4:00 p.m.

DATED: November 7, 2022.

  
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UNITED STATES MAGIS

UNITED STATES MAGISTRATE JUDGE